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October 30, 1997



David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Universal Service Generic Contested Case*
Docket No. 97-00888

Dear Mr. Waddell:

Pursuant to the scheduling order in the above-referenced docket, enclosed for filing are AT&T's Discovery Requests to BellSouth, Citizens Telecom, and United Telephone-Southeast, Inc.



Respectfully Submitted,


Jim Lamoureux 

Encls.

CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that a true and exact copy of the foregoing has been served on counsel of record and other interested parties via First Class Mail postage prepaid, this 30th day of October, 1997.


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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *UNIVERSAL SERVICE GENERIC CONTESTED CASE*

Docket No. 97-00888

**DISCOVERY REQUESTS OF
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T") by its attorneys, hereby requests that BellSouth Telecommunications, Inc. ("BellSouth") respond to the following discovery requests, which are filed pursuant to T.C.A. § 4-5-311, the Tennessee Rules of Civil Procedure, and the Universal Service Phase I Schedule as revised October 17, 1997.

DEFINITIONS

- I. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
- II. The terms "you" and "your" refer to BellSouth.
- III. "Bell Operating Company" means any company defined in 47 U.S.C. §153(35), and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of the Bell Operating Company.

IV. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

V. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

VI. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

VII. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to, conversations, telecommunications, and documents.

VIII. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

IX. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information what would not otherwise not be brought within their scope.

X. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

XI. "Identify" or "identifying" or "identification" when in used in reference to a natural person means to state:

- A. the full legal name of the person;
- B. the name, title and employer of the person at the time in question;
- C. the present or last known employer of such person;
- D. the present or last known home and business addresses of the person; and
- E. the present home and business telephone numbers of the person.

XII. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- A. the full name of the person and any names under which it conducts business;
- B. the present or last known address of the person; and

C. the present or last known telephone number of the person.

XIII. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- A. the type of document (e.g., letter, memorandum, etc.);
- B. the date of the document;
- C. the title or label of the document;
- D. the Bates number or other identifier used to number the document for use in litigation;
- E. the identity of the originator;
- F. the identity of each person to whom it was sent;
- G. the identity of each person to whom a copy or copies were sent;
- H. a summary of the contents of the document;
- I. the name and last known address of each person who presently has possession, custody or control of the document; and
- J. if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

XIV. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication

was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

I. If you contend that any response to any interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- A. the privilege asserted and its basis;
- B. the nature of the information withheld;
- C. the subject matter of the document, except to the extent that you claim it is privileged.

II. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

III. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

IV. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

V. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer

VI. All discovery requests are continuing in nature, and should any circumstances relating to the subject thereby change during the pendency of this proceeding, please notify AT&T immediately of such changed circumstances.

DISCOVERY REQUESTS

DATA REQUEST NO. 1:

Please provide BellSouth's residential total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 2:

Please provide BellSouth's single line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 3:

Please provide BellSouth's multi- line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 4

For the same period as the data provided above, please provide BellSouth's residential revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 5

For the same period as the data provided above, please provide BellSouth's single line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 6

For the same period as the data provided in Data Request No. 3, please provide BellSouth's multi-line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.7

For the same period, please provide BellSouth's residential revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.8

For the same period, please provide BellSouth's single line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.9

For the same period, please provide BellSouth's multi line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 10

Please provide, for the midpoint of the period the data above, the total amount of in-service subscriber lines, separately, for residential service, single line business service and multi line business service. Additionally, provide the quantity of residential in-service subscriber lines that are installed in addition to the first single line at a residence. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.


DATA REQUEST NO. 11:

Please provide the number of promotions for second residential lines BellSouth has offered in Tennessee since January 1, 1995, the time period each promotion was in effect, and provide the terms of each promotion.

DATA REQUEST NO. 12:

For each of the promotions identified item 11, please provide the number of new second lines purchase by subscribers.

Submitted this 30th day of October, 1997.


James P. Lamoureux
AT&T
Room 4060
1200 Peachtree Street, N.E.
Atlanta, GA 30309

Attorney for AT&T Communications of the South
Central States, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *UNIVERSAL SERVICE GENERIC CONTESTED CASE*

Docket No. 97-00888

**DISCOVERY REQUEST OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, INC. TO CITIZENS TELECOMMUNICATIONS OF TENNESSEE AND
CITIZENS TELECOMMUNICATIONS COMPANY OF THE VOLUNTEER STATE**

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to T.C.A. § 4-5-311 and the Tennessee Rules of Civil Procedure and the Universal Service Phase Schedule as revised October 17, 1997, hereby makes these discovery requests to Citizens Telecommunications Company of Tennessee and Citizens Telecommunications Company of the Volunteer State (collectively known as "Citizens Telecom").

DEFINITIONS

- I. "Citizens Telecom" means Citizens Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of Citizens Telecom..
- II. The terms "you" and "your" refer to Citizens Telecom.
- III. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

IV. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

V. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of Citizens Telecom, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

VI. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to, conversations, telecommunications, and documents.

VII. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing,

discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

VIII. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information what would not otherwise not be brought within their scope.

IX. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

X. "Identify" or "identifying" or "identification" when in used in reference to a natural person means to state:

- A. the full legal name of the person;
- B. the name, title and employer of the person at the time in question;
- C. the present or last known employer of such person;
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- E. the present home and business telephone numbers of the person.

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XII. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by

these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- A. the type of document (e.g., letter, memorandum, etc.);
- B. the date of the document;
- C. the title or label of the document;
- D. the Bates number or other identifier used to number the document for use in litigation;
- E. the identity of the originator;
- F. the identity of each person to whom it was sent;
- G. the identity of each person to whom a copy or copies were sent;
- H. a summary of the contents of the document;
- I. the name and last known address of each person who presently has possession, custody or control of the document; and
- J. if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

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- A. the privilege asserted and its basis;
- B. the nature of the information withheld;
- C. the subject matter of the document, except to the extent that you claim it is privileged.

II. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within Citizens Telecom's possession, custody or control as well as in the possession, custody or control of Citizens Telecom's agents, attorneys, or other third parties from which such documents may be obtained.

III. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

IV. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

V. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer

VI. All discovery requests are continuing in nature, and should any circumstances relating to the subject thereby change during the pendency of this proceeding, please notify AT&T immediately of such changed circumstances.

DISCOVERY REQUESTS

DATA REQUEST NO. 1:

Please provide Citizens Telecom's residential total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 2:

Please provide Citizens Telecom's single line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 3:

Please provide Citizens Telecom's multi-line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not

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DATA REQUEST NO. 5

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DATA REQUEST NO. 6

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originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.7

For the same period, please provide Citizens Telecom's residential revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.8

For the same period, please provide Citizens Telecom's single line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.9


For the same period, please provide Citizens Telecom's multi line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category.

If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 10

Please provide, for the midpoint of the period the data above, the total amount of in-service subscriber lines, separately, for residential service, single line business service and multi line business service. Additionally, provide the quantity of residential in-service subscriber lines that are installed in addition to the first single line at a residence. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Submitted this 30th day of October, 1997.



James P. Lamoureux
AT&T
Room 4060
1200 Peachtree Street, N.E.
Atlanta, GA 30309

Attorney for AT&T Communications of the South
Central States, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: *UNIVERSAL SERVICE GENERIC CONTESTED CASE*

Docket No. 97-00888

**DISCOVERY REQUEST OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL
STATES, INC. TO UNITED TELEPHONE-SOUTHEAST, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to T.C.A. § 4-5-311, the Tennessee Rules of Civil Procedure, and the Universal Service Phase Schedule as revised October 17, 1997, hereby makes the following discovery requests to United Telephone-Southeast, Inc. ("UTSE") :

DEFINITIONS

- I. "UTSE" means United Telephone-Southeast, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of United Telephone-Southeast, Inc..
- II. The terms "you" and "your" refer to UTSE.
- III. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.
- IV. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

V. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of UTSE, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

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bring within the scope of these discovery requests any information what would not otherwise not be brought within their scope.

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- A. the full legal name of the person;
- B. the name, title and employer of the person at the time in question;
- C. the present or last known employer of such person;
- D. the present or last known home and business addresses of the person; and
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- B. the date of the document;
- C. the title or label of the document;
- D. the Bates number or other identifier used to number the document for use in litigation;
- E. the identity of the originator;
- F. the identity of each person to whom it was sent;
- G. the identity of each person to whom a copy or copies were sent;
- H. a summary of the contents of the document;
- I. the name and last known address of each person who presently has possession, custody or control of the document; and
- J. if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

XIII. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

I. If you contend that any response to any interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- A. the privilege asserted and its basis;
- B. the nature of the information withheld;
- C. the subject matter of the document, except to the extent that you claim it is privileged.

II. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within UTSE's possession, custody or control as well as in the possession, custody or control of UTSE's agents, attorneys, or other third parties from which such documents may be obtained.

III. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

IV. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

V. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer

VI. All discovery requests are continuing in nature, and should any circumstances relating to the subject thereby change during the pendency of this proceeding, please notify AT&T immediately of such changed circumstances.

DISCOVERY REQUESTS

DATA REQUEST NO. 1:

Please provide UTSE's residential total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 2:

Please provide UTSE's single line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 3:

Please provide UTSE's multi-line business total revenue, separately, for each of the following categories for 1996 or the last recorded twelve months (whichever is later): basic

local service, federal subscriber line charge, state subscriber line charge, vertical/optional services, EAS and other optional calling plans. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 4

For the same period as the data provided above, please provide UTSE's residential revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 5

For the same period as the data provided above, please provide UTSE's single line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 6

For the same period as the data provided in Data Request No. 3, please provide UTSE's multi-line business revenue, separately, obtained from interstate access, intrastate interLATA access and intrastate intraLATA access. Additionally, provide the originating

and terminating access minutes associated with each access revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.7

For the same period, please provide UTSE's residential revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.8

For the same period, please provide UTSE's single line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO.9

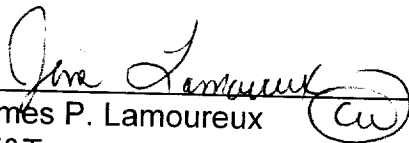
For the same period, please provide UTSE's multi line business revenue, separately, obtained from interstate, intrastate interLATA toll and intrastate intraLATA toll. Additionally, provide the conversation minutes associated with each toll revenue category.

If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

DATA REQUEST NO. 10

Please provide, for the midpoint of the period the data above, the total amount of in-service subscriber lines, separately, for residential service, single line business service and multi line business service. Additionally, provide the quantity of residential in-service subscriber lines that are installed in addition to the first single line at a residence. If the information is not available by the requested categories, please provide the data at the lowest level of disaggregation.

Submitted this 30th day of October, 1997.


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